REMARKS/ARGUMENTS

Re-examination and favorable reconsideration in light of the above amendments and the following claims are respectfully requested.

Claims 1 - 32 are pending in the application. Claims 1 - 19, 28 and 29 have been withdrawn from consideration as being directed to a non-elected invention and claims 20 - 27 and 30 - 32 have been rejected.

By the present amendment, non-elected claims 1 - 19 have been cancelled without prejudice. Applicants will file a divisional patent application to the subject matter of these claims.

In the office action mailed November 4, 2004, claims 20 - 25 and 32 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 4,175,701 to Wojciehowski et al. in view of U.S. Patent No. 5,752,379 to Schafer et al.; and claims 26, 27, 30 and 31 were rejected under 35 U.S.C. 103(a) as being unpatentable over Wojciehowski et al. in view of Schafer et al. and alleged admitted prior art.

The foregoing rejections are traversed by the instant response.

The present invention broadly relates to a system for generating accessory power from a gas turbine engine. The system comprises means for monitoring at least one parameter which provides information about an incipient change in power demand, means for supplying bleed air from the engine during a transient state in response to the at least one monitored parameter, and a pneumatically operated means for receiving the bleed air and for generating power to operate equipment onboard an aircraft.

With regard to the rejection of claims 20 - 25 and 32 on obviousness grounds, the rejection should be withdrawn because

the proposed combination of references is improper. The primary reference to Wojciehowski et al. relates to a liquid spraying system onboard an aircraft. The system includes a pneumatic motor (24) which is operated by bleed air from an engine compressor. The system also includes a poppet valve (46) which is used to control the flow of bleed air to the motor (24). Wojciehowski et al.'s system does not have any means for monitoring at least one parameter which provides information about an incipient change in power demand and means for supplying bleed air from the engine during a transient state *in response to said at least one monitored parameter* (emphasis added). In fact, there is absolutely no reason or need to provide Wojciehowski et al.'s system with either of the claimed means. The Schafer et al. patent relates to a system for indicating non-recoverable compressor surge and blow-out. The system includes a FADEC unit which is part of the fuel control system for the engine. It is submitted that there is absolutely no reason why one of ordinary skill in the art would be motivated to include the FADEC of the Schafer et al. system in the Wojciehowski et al.'s system. It serves no purpose with regard to the operation of the liquid spraying system. Even if one were to find a valid reason for combining the teachings of Wojciehowski et al. and Schafer et al., there still would be no means for supplying bleed air from said engine during a transient state in response to said at least one monitored parameter. Neither references teaches any such means. For this reason, claim 20 is clearly allowable over the proposed combination of references.

Claims 21 - 25 and 32 are allowable for the same reasons as claim 20 as well as on their own accord. For example, neither reference teaches or suggests a control valve which is opened or modulated by a signal from the electronic engine control device

as set forth in claim 23, which valve is used to supply bleed air to a pneumatically operated means (claim 24). Claim 25 is allowable because neither reference teaches or suggests a feedback loop for transmitting a signal to the electronic control device representative of control valve position. Claim 32 is allowable because the Examiner's comments about the application of the references is nonsensical and serves to point out the ill conceived nature of the rejection. The pneumatically operated means in Wojciehowski et al. is a pneumatic motor which is completely independent of engine operation. Its use has no effect on all on engine operation. Thus, the pneumatically operated means in Wojciehowski et al. will not in any way increase the amount of stall margin available to a high pressure compressor of the engine. If the Examiner is going to maintain this position, the Examiner needs to more fully explain how the operation of the pneumatic motor in Wojciehowski et al. will increase the amount of stall margin available to the compressor.

For these reasons, the rejection of claims 20 - 25 and 32 should be withdrawn.

With regard to the rejection of claims 26, 27, 30, and 31, this rejection too is ill conceived. First, the only thing that the Examiner has shown is that certain claimed features by themselves are old in the art. Something being old in the art is not a sufficient basis to form an obviousness rejection. More is needed - a teaching, a suggestion, or motivation which flows from the references. See *In re Rouffet*, 47 USPQ2d 1453, 1457-58 (Fed. Cir. 1998). There is absolutely no reason to provide Wojciehowski et al.'s system with the pneumatically integrated generator of claims 26 and 27 and/or the turbine connected to the gearbox and the generator driven by the air turbine of claim 30 and/or the air turbine and generator driven

by the air turbine of claim 31. None of these claimed features are needed to operate the liquid spraying system of Wojciehowski et al. In fact, they would serve no purpose with regard to the operation of the liquid spraying system. For these reasons, claims 26, 27, 30, and 31 are clearly allowable over the cited and applied references.

For the foregoing reasons, the instant application is believed to be in condition for allowance. Such allowance is respectfully solicited.

Should the Examiner believe an additional amendment is needed to place the case in condition for allowance, he is hereby invited to contact Applicants' attorney at the telephone number listed below.

No fee is believed to be due as a result of this response. Should the director determine that a fee is due, he is hereby authorized to charge said fee to Deposit Account No. 02-0184.

Respectfully submitted,

Timothy M. Morris et al.

By _____

Barry L. Kelmachter
BACHMAN & LaPOINTE, P.C.
Reg. No. 29,999
Attorney for Applicants

Telephone: (203)777-6628 ext. 112
Telefax: (203)865-0297
Email: docket@bachlap.com

Date: February 1, 2005

I, Nicole Motzer, hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: "Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313" on **February 1, 2005**.

_____